

REDACTED

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

SAMSUNG ELECTRONICS CO., LTD.,
SAMSUNG ELECTRONICS AMERICA, INC.,
SAMSUNG TELECOMMUNICATIONS
AMERICA GENERAL, L.L.C.,
SAMSUNG SEMICONDUCTOR, INC., and
SAMSUNG AUSTIN SEMICONDUCTOR L.L.C.,

Plaintiffs.

v.

ON SEMICONDUCTOR CORP.

and

SEMICONDUCTOR COMPONENTS
INDUSTRIES, LLC.

Defendants.

Civil Action No. 06-720 (***)

REDACTED

**DECLARATION OF JAY SHIM IN SUPPORT OF PLAINTIFFS'
OPPOSITION TO DEFENDANTS' MOTION TO DISMISS**

I, JAY SHIM, declare that the following is true and correct:

1. I am Vice President and General Patent Counsel of Samsung Electronics Co., Ltd.

I submit this Declaration in support of Plaintiffs' opposition to Defendants' motion to dismiss.

REDACTED

REDACTED

REDACTED

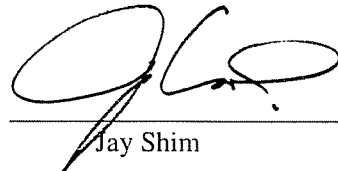
REDACTED

REDACTED

15. On Monday, December 4, 2006, I learned that Defendants had filed suit against Samsung in Texas, adding a patent that they never disclosed to Samsung. This confirmed to me that Defendants had been planning litigation against Samsung all along.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: January 12, 2007



Jay Shim

CERTIFICATE OF SERVICE

I, Andrew A. Lundgren, Esquire, hereby certify that on January 12, 2007, I caused to be electronically filed a true and correct copy of the foregoing document with the Clerk of the Court using CM/ECF, which will send notification that such filing is available for viewing and downloading to the following counsel of record:

Karen Jacobs Loudon, Esquire
Morris Nichols Arsht & Tunnell
1201 North Market Street
PO Box 1347
Wilmington, DE 19899-1347

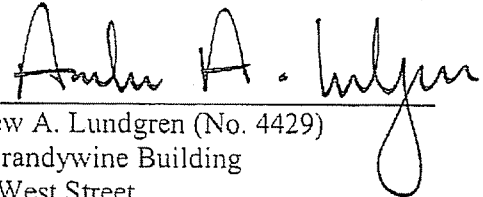
I further certify that on January 12, 2007, I caused a copy of the foregoing document to be served by **hand delivery** on the above-listed counsel of record and on the following non-registered participants in the manner indicated:

BY FEDERAL EXPRESS

Kenneth R. Adamo, Esquire
Jones Day
2727 North Harwood Street
Dallas, TX 75201

T. Gregory Lanier, Esquire
Behrooz Shariati, Esquire
Jones Day
2882 Sand Hill Road, Suite 240
Menlo Park, CA 94025

YOUNG CONAWAY STARGATT & TAYLOR, LLP

A handwritten signature in black ink, appearing to read "Andrew A. Lundgren", is written over a horizontal line.

Andrew A. Lundgren (No. 4429)
The Brandywine Building
1000 West Street
Wilmington, DE 19801
302-571-6600
alundgren@ycst.com